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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

SRT-4J**MEMORANDUM**

DATE: January 27, 2010

SUBJECT: Comments for the initial revision of the Work Plan of Wabash River Bank Coal Tar mitigation (former Western Tar facility), IN (Phase/Stage: removal)

FROM: Alida Roberman, Chemist, Field Services Section (FSS)

TO: Verneta Simon, on-scene coordinator (OSC))

I am providing comments for the initial revision of the Work Plan for the Wabash River Bank Coal Tar mitigation (former Western Tar facility), IN. The Work Plan was prepared by Keramida Inc. The subject of the Work Plan was received by the Field Services Section (FSS) on January 6, 2010 (SF Log-in No. 3856).

The following must be addressed before approval of the document:

1. A Project/Task Organization chart should be provided to identify the individuals or organizations participating in the project and designate their specific roles and responsibilities and lines of communication among all project participants, including the EPA.
2. Standard Operating Procedures (SOPs) from the Pace analytical laboratory should be submitted for review.
3. Method Reporting Limits (RL) and Method Detection Limits (MDL). *A summary table with the Project action (requirements) limits*, achievable laboratory detection and reporting limits for all analytes and compounds in all matrices (soil, water, etc.) should be provided.
4. The Chain-of-Custody forms from all participating laboratories should be included in the QAPP.
5. Please provide a schedule of work to be performed in graphic or tabular format. The time line must include the start and completion dates for all project activities.
6. A summary table of the sampling and analysis program should be provided for review.
7. Data Verification/Validation. Please explain how the data review and verification will be organized in this project to meet the Superfund

requirements (100% laboratory data validation must be performed by an entity independent of the laboratory).

P.S. The superfund division implemented a new format for QAPP preparation. It is based on the same EPA QA/R-5 document but the format is different. The new format is in the form of worksheets. It should be easier for contractors to prepare this new QAPP and QA reviewers will need less time to review these documents. I recommend that any new QAPP or QAPP amendment/addendum use the UFP-QAPP format which can be found at <http://www.epa.gov/fedfac/documents/qualityassurance.htm>